

FORM TO BE USED BY A PRISONER IN  
FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN DISTRICT OF OHIO

Russell GATTNER

(Enter above the full name of the plaintiff in this action)

VS.

JAMES DEAL ET AL; MARTY ALLEN;  
SHEENA BLACK; AND: MR. ODGEN.  
~~WARDEN~~

(Enter above the full name of the defendant(s) in this action)

1:20 CV 360  
CIVIL CASE NO. 200X0169

THERE IS NO JUDGE ASSIGNED.  
JUDGE ONLY THE CLERK, STEPHEN E. CASTON

COMPLAINT

JOHN TRICKI DEMANDS  
JUDGE BARKER

MAG. JUDGE BAUGHMAN

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ☒ NO ☐
- B. If your answer to A is yes, describe the lawsuit in the space below, (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs Russell GATTNER

N/A

(1) WARDEN; JAMES DEAL; SHEENA BLACK; (3) MR.  
ODGEN (4) WARDEN MARTY ALLEN

2. Court (if federal court, name the district; if state court, name the county)

OFFICE OF THE CLERK, UNITED STATES DISTRICT COURT SOUTHERN DISTRICT  
OF GEORGIA STATEBORO DIVISION POST OFFICE BOX 8286 SAVANNAH, GA 31412.  
COURT OF APPEALS OF GEORGIA 501/47 TRINITY AVE. ATL. GA. 30334.

3. Docket Number 200X0169 / 21900468

4. Name of judge to whom case was assigned THERE IS NO JUDGE ASSIGNED IN THE  
COURT OF APPEALS OF GEORGIA 501/47 TRINITY AVE. ATL. GA. 30334  
ONLY THE CLERK, STEPHEN E. CASTON IN ALL MATTERS.

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5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

Still Pending. "SEE" EXHIBIT A: (1) NOTICE OF REMITTANCE.

6. Approximate date of filing lawsuit AUGUST 12, 2019.

7. Approximate date of disposition DECEMBER 4, 2019.

II. Place of Present Confinement GEORGIA STATE PRISON REDESVILLE, GEORGIA 30453.

A. Is there a prisoner grievance procedure in this institution? YES ☒ NO ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

YES ☒ NO ☒

C. If your answer is YES,

1. What steps did you take? FILED (2) DIFFERENT GRIEVANCES; (1) WAS DENIED AT ALL LEVELS; (2) AS OF FILE DATE 11/19/19 I'M STILL BEING DENIED. TWO MORE DENIED AT ALL LEVELS.

2. What was the result? (1) WAS DENIED AND THE OTHER ONE

AS AT THIS DATE 11/19/19 STILL BEING DENIED IN FILING IT BY THE GRIEVANCE COORDINATOR TONESSER SPELLS AT THIS GEORGIA STATE PRISON REDESVILLE, GA 30453. "SEE" EXHIBIT (1) CIVIL RIGHTS COMPLAINT FORM.

D. If your answer is NO, explain why not I'M BEING DENIED IN FILING

(1) BY THE GRIEVANCE COORDINATOR TONESSER SPELLS AT THIS GEORGIA STATE PRISON REDESVILLE, GEORGIA 30453.

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

YES ☒ NO ☐

F. If your answer is YES,

1. What steps did you take? WROTE TO GEORGIA DEPARTMENT OF

CORRECTIONS IMMEDIATE ATTORNEY FORBETH, GEORGIA 31089. NO RESPONSE.

2. What was the result? NO RESPONSE.

N/K

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## III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any).

A. Name of the Plaintiff RUSSELL CARTER

Address GEORGIA STATE PRISON REIDSVILLE, GEORGIA 30453

(In item B below, place the full name of the defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Use item C for the names, positions and places of employment of any additional defendants).

B. Defendant JAMES DEAL is employed as

WARDEN at GEORGIA STATE PRISON REIDSVILLE, GA. 30453

C. Additional Defendants SHAWN BLACK RECORD OFFICER AT GEORGIA STATE PRISON REIDSVILLE, GEORGIA 30453. MR. ODGEN MR

COUNSELOR AT THE GEORGIA STATE PRISON REIDSVILLE, GA. 30453.  
MARTIN ALLEN, WARDEN AT GEORGIA STATE PRISON REIDSVILLE,  
GEORGIA 30453.

## IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separated paragraph. Use as much space as you need. (Attach extra sheet(s) if necessary).

PLAINTIFF ALLEGES DENIAL OF ADEQUATE SUPPLIES TO PURSUE HIS  
LEGAL CLAIMS. JAMES DEAL IS THE WARDEN AT THE GEORGIA STATE  
PRISON REIDSVILLE, GEORGIA 30453. HE IS REFUSING TO HOLD PRISONERS  
TO RULES AND PROCEDURES NOT IN IMMATE HANDBOOK. DEFENDANT  
JAMES DEAL THE WARDEN ILLEGAL ACTIONS, FAILING TO CORRECT  
THE MESSAGING IN THE PRISON COMPLAINT PROCEDURES AND ENCOURAGING  
THE CONSTITUTION VIOLATIONS AND RESPONSIBLE FOR THE OPERATION OF  
THE GEORGIA STATE PRISON AND FOR THE WELFARE OF ALL INMATES. IN  
3/13/19 PLAINTIFF WROTE TO DEFENDANT JAMES DEAL THE WARDEN  
AT THE GEORGIA STATE PRISON ASKING FOR HELP IN TRYING TO GET  
ADEQUATE SUPPLIES (1) A WEEK, AND NOT ONCE A MONTH SO HE  
CAN WRITE TO THE COURTS AND ALL SUPERIORS, WITHOUT WASTING ON  
THE BACK SIDES OF ANY LEGAL DOCUMENTS OR BACK SIDES OF ANY  
USED PAPERS AS TO THIS DATE 11/19/19 NO RESPONSE. "SEE" EXHIBIT (5)  
SUBSEQUENT LEGAL SUPPLIES REQUEST FORM. ON 3/25/19 FILED ALL  
COMPLAINT AT THE GEORGIA STATE PRISON TRYING TO GET ADEQUATE



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## (Statement of Claim Continued)

SUPPLIES TO PERSUE HIS LEGAL CLAIMS. IT WAS DENIED BY THE DEFENDANT JAMES DEAN THE WARDEN, AT THE GEORGIA STATE PRISON AT ALL LEVELS; AND WAS DENIED TO APPEAL FURTHER BY THE GRIEVANCE COORDINATOR TUNESIA SPELLS AT THE GEORGIA STATE PRISON. "SEE" EXHIBIT (6) GRIEVANCE

(2) DEFENDANT; MARTY ALLEN THE WARDEN, AT THE GEORGIA STATE PRISON REDESVILLE, GEORGIA 30453, ALSO REFUSING TO HOLD PRISONERS TO RULES AND PROCEDURES NOT IN ANIMATE HANDBOOK; HAS ILLEGAL ACTIONS TAKING TO CORRECT THE CONSTITUTION VIOLATION THROUGH THE PRISON GRIEVANCE PROCEDURE; HE IS RESPONSIBLE FOR THE OPERATION OF THE GEORGIA STATE PRISON, AND FOR THE WELFARE OF ALL INMATES. ON 6/6/18 FILED AN GRIEVANCE AT THE GEORGIA STATE PRISON IN TAKING TO GET ADEQUATE SUPPLIES ONCE A WEEK; AND NOT ONCE A MONTH SO HE COULD PERSUE HIS LEGAL CLAIMS; AND NOT WRITING TO THE COURT'S AND ALL SUPERIORS ON BACK BOOKS OF ANY LEGAL DOCUMENTS OR BACK SIDES OF ANY USED PAPER. THE GRIEVANCE WAS DENIED BY DEFENDANT MARTY ALLEN THE WARDEN, AT THE GEORGIA STATE PRISON; AND WAS DENIED IN FILING FURTHER BY THE GRIEVANCE COORDINATOR TUNESIA SPELLS AT THE GEORGIA STATE PRISON. "SEE" EXHIBIT (2) AND DENIED DENIED IN FILING THE CIVIL ACTION IN THE SUPERIOR COURT OF TATNALL COUNTY REDESVILLE, GEORGIA, AND EXHIBIT (3) INMATE FORM FOR CIVIL ACTION; AND: EXHIBIT (1) NOTICE TO ALL INMATES FILING HABEAS CORPUS CASES, CIVIL CASES OR ANY LEGAL DOCUMENTS IN THE SUPERIOR COURT OF TATNALL COUNTY. THE DEFENDANT SHEENA BLACK THE RECORD OFFICIAL AT THE GEORGIA STATE PRISON REFUSED TO GIVE PLAINTIFF THE TRUST FUND STATEMENT TO FILE IN FORMS PROPER AS OF THIS DATE 11/19/19 STILL BEING REFUSED. "SEE" EXHIBIT (7) GRIEVANCE DENIED BY MARTY ALLEN THE WARDEN.

(3) THE DEFENDANT SHEENA BLACK, THE RECORD OFFICIAL AT THE GEORGIA STATE PRISON REDESVILLE, GEORGIA 30453 IS DENYING THE PLAINTIFF ADEQUATE SUPPLIES ONCE A WEEK AS REQUESTED AND GIVING ONCE A MONTH TO PERSUE HIS LEGAL CLAIMS; BY ANSWERING TO THE COURT'S AND ALL OTHER SUPERIORS WRITING ON BACK BOOKS OF ANY LEGAL DOCUMENTS OR BACK SIDES OF ANY USED PAPER. THE DEFENDANT SHEENA BLACK THE RECORD OFFICIAL AT THE GEORGIA STATE PRISON ALSO DENYING PLAINTIFF THE TRUST FUND STATEMENT TO FILE IN FORMS PROPER. ON 7/23/19 PLAINTIFF FILED AN GRIEVANCE ON THE DEFENDANT SHEENA BLACK AT THE GEORGIA STATE PRISON. ON 8/2/19 THE GRIEVANCE WAS RETURNED BACK TO PLAINTIFF SAYING HE HAS (2) ACTIVE GRIEVANCES AT THE LOCAL LEVEL, AS OF THIS DATE 11/19/19 STILL BEING DENIED IN FILING THE GRIEVANCE; BY THE GRIEVANCE COORDINATOR TUNESIA SPELLS, AT THE GEORGIA STATE PRISON.

(4) THE DEFENDANT MR. ODGEN MY COUNSELOR AT THE GEORGIA STATE PRISON REDESVILLE, GEORGIA 30453 ARE DENYING PLAINTIFF ACCESS TO THE COURT'S IN GIVING PLAINTIFF THE FORMS TO GET INMATE SUPPLIES; AND INMATE FORMS TO MAIL OUTGOING MAIL. ALL INMATE / PRISONERS ARE TOLD TO GET THE FORMS FROM THE COUNSELORS THAT WORK HERE AT THE GEORGIA STATE PRISON; THEY ARE ALSO OTHER FORMS. ON 12/14/18 DEFENDANT MR. ODGEN MY COUNSELOR WORK HERE AT THE GEORGIA STATE PRISON; CAME TO VISIT THE PLAINTIFF IN MEDICAL SEQUESTERED LOCKDOWN TIER 4 PROGRAM. PLAINTIFF ASKED THE DEFENDANT FOR THE FORMS TO GET INMATE SUPPLIES; AND FORM TO MAIL OUT INMATE MAIL. I WAS TOLD HE WOULD MAIL THEM TO ME. ON 12/18/18 I WROTE TO DEFENDANT MR. ODGEN AT THE GEORGIA STATE PRISON SPELL ASKING FOR THE FORMS SO I COULD GET INMATE SUPPLIES; AND SEND OUT INMATE MAIL OUT. ON 7/23/19 FILED AN GRIEVANCE "SEE" EXHIBIT (8) GRIEVANCE. IT WAS DENIED BY WARDEN MR. BOBBITT AT THE GEORGIA STATE PRISON REDESVILLE, GEORGIA 30453 AT ALL LEVELS AND WAS DENIED IN FILING FURTHER BY THE GRIEVANCE COORDINATOR TUNESIA SPELLS, AT THE GEORGIA STATE PRISON. AS TO THIS DATE 11/19/19 STILL BEING DENIED BY DEFENDANT MR. ODGEN MY COUNSELOR WORK AT THE GEORGIA STATE PRISON IN REDESVILLE THE FORMS TO GET ADEQUATE

## IV. (STATEMENT OF CLAIMS)

SUPPLIES; AND TO MAIL OUTGOING MAIL. PLAINTIFF HAS COURT ORDER'S WITHIN DATES TO FILE WRITEN MOTIONS. ON 9/5/19 THE PLAINTIFF RECEIVED THE GREENBACK BACK FROM THE GEORGIA STATE PRISON GREENBACK OFFICE; IT WAS DENIED AT ALL LEVELS AS WELL. IT TOOK FORTY THREE (43) DAYS TO RECEIVE IT FROM FIRST BEING FILED. ON 9/4/19 THE PLAINTIFF APPEARED THE GREENBACK FURTHER AT THE GEORGIA STATE PRISON REEDSVILLE, GEORGIA 30453 GREENBACK OFFICE; AS TO THIS DATE 11/19/19 NO RESPONSE.

(5) ALL THE DEFENDANT(S) WARDEN, JAMES DEAL; WARDEN, MARTY ALLEN; DEFENDANT SHERID BLACK; AND DEFENDANT MR. ODGEN IS SOON INDIVIDUAL AND IN HIS/HER CAPACITY AT ALL TIMES MENTIONED IN THIS COMPLAINT.

(6) ALL THE DEFENDANT(S) WARDEN, JAMES DEAL; WARDEN, MARTY ALLEN; DEFENDANT SHERID BLACK; AND DEFENDANT MR. ODGEN HAVE BEEN, AND CONTINUE TO ACT UNDER COLOR OF STATE LAW.

(7) THE ALLEGATIONS OF RESTRICTIONS ON LEGAL MATERIALS SUPPORTED WITH SPECIFIC FACTS INCLUDING EACH OF THE DEFENDANT(S) ACTIONS, THE CASE TO WHICH THE ACTIONS WERE RELATED, HOW THEY EFFECTED THE CASE, AND THE OUTCOME OF THE CASE.

(8) PLAINTIFF WHO/STILL WAS SUFFERING APOORLY ACTIONABLE HARM THAT HE WISH TO BRING BEFORE THE COURT'S, BUT SO STYMIED BY INADEQUATE SUPPLIES HE WAS UNABLE TO EVEN FILE A COMPLAINT.

(9) THE UNAVAILABILITY OF PAPER AND ENVELOPES FOR DAYS OR WEEKS AT A TIME DENIED COURT ACCESS.

(10) THE PLAINTIFF HAS SHOW DEPRIVATION OF HIS CONSTITUTIONAL RIGHTS; IT CANNOT, HOWEVER BE HELD TO BE OFFICIALS LICENSE TO THwart LITIGATION ONCE IT IS FILED. PRISON OFFICIALS MUST PROVIDE INDECENT EXHIBITS WITH BASIC CORRESPONDENCE SUPPLIES AND POSTAGE FOR LEGAL MAIL.

(11) UPON INFORMATION AND BELIEF SINCE THE FILING OF THIS COMPLAINT THE PLAINTIFF HAS LEARNED THAT COUNSELOR MS. HEARTMICKER THAT WORK AT THE GEORGIA STATE PRISON REEDSVILLE, GEORGIA 30453; AND COUNSELOR MR. BATEMAN THAT WORK AT THE GEORGIA STATE PRISON REEDSVILLE, GEORGIA 30453 ARE DENYING HIM INDEPENDENT FORMS TO GET LEGAL SUPPLIES; AND INDEPENDENT FORMS TO MAIL OUTGOING MAIL; "SEE" THE PLAINTIFF ONLY COPY WROTE ON THE BACK SIDE OF ANY LEGAL DOCUMENT. "SEE" EXHIBIT (9).

(12) A PERSON CONVICTED BY A STATE IS ENTITLED TO THE SAME FREE TRIAL AT YOUR HANDS AS IS ANY INDIVIDUAL. THE LAW IS NO MORE RESPECTFUL OF ONE PERSON THAN ANOTHER, AND ALL PERSONS, INCLUDING PRISONERS SHOULD EQUAL BEFORE THE LAW AND ARE TO BE DEALT WITH AS EQUALS IN A COURT OF JUSTICE.

(13) THE QUESTION PRESENTED IS OF GREAT PUBLIC IMPORTANCE BECAUSE IT AFFECTS THE OPERATIONS OF THE PRISON SYSTEMS IN ALL (50) STATES, THE DISTRICT OF COLUMBIA, AND HUNDREDS OF CITY AND COUNTY SHELLS.

(14) THE DEFENDANT CARRIED OUT UNLAWFUL ACTIVITIES WITH UNNECESSARY HARSHNESS, OR ABUSED HIS/HER OFFICIAL POWER, OR TOOK UNFAIR ADVANTAGE OF THE PLAINTIFF.

(15) THIS IS A CIVIL RIGHTS ACTION UNDER 42 U.S.C. § 1983 BROUGHT BY A STATE PRISONER WHO ALLEGES THAT HE IS BEING DENIED ADEQUATE SUPPLIES TO PURSUE HIS LEGAL CLAIMS AT THE GEORGIA STATE PRISON REEDSVILLE, GEORGIA 30453.



## IV. (STATEMENT OF CLAIM CONTINUED)

- (16) UPON INFORMATION AND BELIEF PLAINTIFF BELIEVE THAT FELLOW OF THE COMPLAINT THE PLAINTIFF HAS LEARNED ON NOVEMBER 21, 2019 THAT COUNSELOR MS. PHELPS THAT WORK HERE AT THE GEORGIA STATE PRISON REIDSVILLE, GEORGIA 30453 HAS BEEN SINCE OCTOBER OF 2019 SUPPLYING THE PLAINTIFF WITH INDECENT FORMS TO GET INDECENT SUPPLIES; AND INDECENT FORMS TO MAIL OUT LEGAL MAIL AT THE GEORGIA STATE PRISON NO ONE ELSE/ OR THE PLAINTIFF DON'T KNOW ANY MORE COUNSELOR'S NAME TO WRITE TO ASKING FOR HELP IN RECEIVING THE INDECENT FORMS. PLAINTIFF BELIEVE THAT MS. PHELPS THAT WORK HERE AT THE GEORGIA STATE PRISON REIDSVILLE, GEORGIA 30453 ARE GOING TO DENY IN GIVING THE PLAINTIFF THE INDECENT FORMS. "SEE" EXHIBIT (18) A CHECK IN NOTE ON EXHIBIT (9).
- (17) UPON INFORMATION AND BELIEF PLAINTIFF USE TO BE COUNSELOR MS. CHESTER THAT WORK HERE AT THE GEORGIA STATE PRISON REIDSVILLE, GEORGIA 30453 ARE DENYING THE PLAINTIFF INDECENT FORMS TO GET INDECENT SUPPLIES AND INDECENT FORMS TO MAIL OUTGOING MAIL AS WELL AS USE TO BE COUNSELOR MS. BROWN.
- (18) THE INDECENT FORMS TO GET INDECENT SUPPLIES; AND THE INDECENT FORMS TO MAIL OUTGOING MAIL HAS TO BE SENT TO THE DEFENDANT SHELLA BLACK, THE RECORD OFFICIAL THAT WORK IN THE BUSINESS OFFICE AT THE GEORGIA STATE PRISON REIDSVILLE, GEORGIA 30453 FOR APPROVED.
- (19) THE PLAINTIFF SINCE JUNE OF 2018 OR BEFORE HAS BEEN ASKING ALL THE DEFENDANT(S) IN EXHIBIT (2) INMATE FORM FOR CIVIL ACTION; FOR HELP IN GETTING ADEQUATE SUPPLIES; AS HE WAS FILING LEGAL DOCUMENTS WITH THE COURTS; AND ALL SUPERVISORS WRITING ON BACK SIDES OF ALL LEGAL DOCUMENTS OR BACK SIDES OF ANY USED PAPER AS OF THIS DATE NOVEMBER 23, 2019 STILL WITHOUT ALL RESPONSE FROM THE COURTS; AND ALL LETTERS SUPERVISORS IN THE EXHIBIT (9) INMATE FORM FOR CIVIL ACTION.
- (20) THE EXHIBIT (4) NOTICE OF REMITTANCE DATED OCTOBER 4, 2019 FROM OFFICE OF THE CLERK, COURT OF APPEAL OF GEORGIA 47 JAKLEY AVENUE SUITE 501 ATLANTA, GEORGIA 30334 IS REFUSING THE PLAINTIFF ALL RESPONSE; THE CAY FOR HELP IN GETTING ADEQUATE SUPPLIES SO HE CAN PERSUE HIS LEGAL CLAIMS.
- (21) THE PLAINTIFF ASK(S) THE HONORABLE COURT/DISTRICT COURT FOR IMMEDIATELY 18 U.S.C. § 3606 INJUNCTION RELIEF SO HE CAN GET ADEQUATE SUPPLIES WITH A WEEK FROM THE DEFENDANT SHELLA BLACK THE RECORD OFFICIAL THAT WORK IN THE BUSINESS OFFICE AT THE GEORGIA STATE PRISON REIDSVILLE, GEORGIA 30453 SO HE CAN PERSUE HIS LEGAL CLAIMS; OR PLEASE SEND IMMEDIATELY THE FORM; OR FORMS FOR FILING TO ADEQUATE PERMIT.
- (22) INMATE INMATES MUST BE PROVIDED AT STATE EXPENSE WITH PAPER AND PEN TO DRAFT LEGAL DOCUMENTS. THE PLAINTIFF IS SUFFERING ACTUAL INJURY BY BEING "FRUSTRATED" OR "IMPEDED" IN WRITING TO THE COURTS; AND ALL SUPERVISORS; AND:
- (23) THE PLAINTIFF CASE APPEARS TO HAVE MANY AND MOST OF THE FOREMENTIONED FACTORS HAVE BEEN MET, COURT SHOULD MAKE EVERY ATTEMPT TO OBTAIN COUNSEL.
- (24) PERSONAL JURISDICTION THIS COURTS, POWER TO HEAR A CASE AGAINST PARTICULAR PARTIES (E.G.) TO MAKE A RETIREMENT OF ONE STATE DEFEND A LAWSUIT BROUGHT IN THE COURTS OF ANOTHER STATE.
- (25) CHANGE OF VENUE AS AT ISSUE, VENUE IS MORE APPROPRIATE IN ANOTHER DISTRICT.

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## V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes).

- (1) THE PLAINTIFF ASK(S) FOR A JURY TRIAL DEMAND.
- (2) THE PLAINTIFF ASK(S) THE HONORABLE COURT TO ISSUE AN IMMEDIATE JURY ORDER SO HE CAN RECEIVE ADEQUATE SUPPLIES ONCE A WEEK AND NOT ONCE A MONTH SO HE CAN FINISH HIS LEGAL CLASSES; OTHER THAN RESPONSIBILITIES TO THE COURT'S AND ALL SUPERVISORS; AS WELL AS FAMILY MEMBER WHITTING ON THE BACK SIDES OF ANY LEGAL DOCUMENT; OR BACK SIDES OF ANY USED PAPER.
- (3) AWARD COMPENSATORY DAMAGES/PUNITIVE DAMAGES IN THE AMOUNT TO ALL DEFENDANT EQUAL \$40,000.00 AND:
- (4) GRANT SUCH OTHER RELIEF AS IT MAY APPEAR THAT THE PLAINTIFF IS ENTITLED.
- (5) IN THIS CASE THE GRANT OF RELIEF WILL SERVE THE PUBLIC INTEREST FOR PRISON OFFICIALS TO OBEY THE LAW, ESPECIALLY THE CONSTITUTION.
- (6) RESPECT FOR LAW PARTICULARLY BE OFFICIALS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE'S CORRECTIONAL SYSTEM IN ITSELF A MATTER OF THE HIGHEST PUBLIC INTEREST. THE CONSTITUTION IS THE ULTIMATE EXPRESSION OF THE PUBLIC INTEREST.
- (7) PLAINTIFF ASK(S) JURY ORDER TO PREVENT ACCOUNTANT OF MATTERS NOT IN EVIDENCE.

Signed this 4 day of DECEMBER, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

12/4/19

(Date)

Russell J. Gathers  
(Signature of Plaintiff)